

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

PAUL D. ETIENNE, et al.,

Plaintiffs,

v.

ROBERT W. FERGUSON, et al.,

Defendants.

Case No. 3:25-cv-05461-DGE

**DECLARATION OF MATTHEW T.
MARTENS IN SUPPORT OF
PLAINTIFFS' REPLY IN FURTHER
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

DECLARATION OF M. MARTENS
IN SUPPORT OF REPLY
(No. 3:25-cv-05461-DGE)

1 I, Matthew T. Martens, hereby declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP and counsel to
3 Plaintiffs in the above-captioned matter.

4 2. I am over the age of eighteen and competent to make this declaration. I make this
5 declaration based on personal knowledge about which I am competent to testify.

6 3. Attached as Exhibit 8 is a true and correct copy of a webpage, *Youth Protection*, on
7 the website of Scouting America, available at [https://www.scouting.org/training/youth-](https://www.scouting.org/training/youth-protection/)
8 [protection/](https://www.scouting.org/training/youth-protection/).

9 4. Attached as Exhibit 9 is a true and correct copy of a webpage of the Immigration
10 Law Clinic of the University of Washington School of Law, available at
11 <https://www.law.uw.edu/academics/experiential-learning/clinics/immigration-law>.

12 5. Attached as Exhibit 10 is a true and correct copy of an October 27, 2023 press
13 release, *Gonzaga Law School Announces New Children's Rights Justice Initiative*, available at
14 <https://www.gonzaga.edu/news-events/stories/2023/10/27/childrens-rights-justice-initiative>.

15 6. Attached as Exhibit 11 is a true and correct copy of a webpage of the General Public
16 Practice and Indian Law Clinic of Gonzaga Law School, available at
17 <https://www.gonzaga.edu/school-of-law/clinic-centers/law-clinic/indian-law>.

18 7. Attached as Exhibit 12 is a true and correct copy of the July 12, 2012 *Report of the*
19 *Special Investigative Counsel Regarding the Actions of the Pennsylvania State University Related*
20 *to the Child Sexual Abuse Committed by Gerald A. Sandusky* by Freeh Sporkin & Sullivan, LLP.

21 8. Attached as Exhibit 13 is a true and correct copy of the Non-Prosecution Agreement
22 in *In re Grand Jury Proceedings*, Case No. 02-S-1154 (N.H. Super. Ct.).

23 9. Attached as Exhibit 14 is a true and correct copy of the December 11, 2008
24 *Assessment of Diocese of Manchester's Compliance Program for The New Hampshire Attorney*
25 *General's Office*.

26 * * *

27 DECLARATION OF M. MARTENS
28 IN SUPPORT OF REPLY
(No. 3:25-cv-05461-DGE)

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CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 • Seattle, WA 98101
(206) 209-0456
www.crowlylawoffices.com

1 I declare under penalty of perjury that the foregoing is true and correct.

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3 _____

4 Matthew T. Martens

5 EXECUTED this 7th day of July, 2025, at Washington, D.C.
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28 DECLARATION OF M. MARTENS
IN SUPPORT OF REPLY
(No. 3:25-cv-05461-DGE)